

MINORITY MEDIA AND  
TELECOMMUNICATIONS COUNCIL

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October 26, 2002

Hon. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

RE: MR Docket No. 02-277 (Biennial Review of  
Broadcast Ownership Rules)

MM Docket No. 01-235 (Broadcast/Newspaper  
Crossownership)

MM Docket No. 01-317 (Local Radio Ownership)

MM Docket No. 00-240 (Definition of Radio  
Markets)

Pursuant to 47 CFR §1.1206, this will disclose that in these permit-but-disclose proceedings, the Minority Media and Telecommunications Council ("MMTC") made an oral ex parte presentation at a Wednesday, October 23, 2002, 4:00 PM meeting with Susan Eid, Esq., Legal Assistant to Chairman Powell. The presentation was made by me.

I addressed MMTC's "Motion for Revision of Procedural Dates, Expansion of the Scope of the Proceeding, And Inclusion of Additional Studies in the Record" filed by MMTC and the National Association of Black Owned Broadcasters ("NABOB") (dated October 9, 2002 and filed October 10, 2002). I maintained that because of the wide scope and complexity of the issues, the short time limits for public comment would ensure that parties would just submit their hard line views, without the benefit of consultation with other parties or empirical research. I stated that MMTC would convene the stakeholders to examine how the issues in the proceeding can be narrowed, whether research can be performed jointly by the parties, and whether regulatory relief in the proceeding could be fashioned to promote minority ownership.

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I briefly discussed some of the fourteen FCC-sponsored research studies in the record, noting that while most of the studies appeared methodologically sound albeit limited in scope, the studies did not adequately address the issues of minority ownership and minority inclusion in program service.

I expressed the view that the NPRM had not sufficiently addressed how minority ownership would be affected and how it can be promoted through the ownership rules under consideration. I also urged the inclusion of five of the Section 257 (Adarand) studies in the record of the omnibus ownership proceeding.

An original and two copies of this letter are being filed with the Secretary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Honig', is written over the printed name and title.

David Honig  
Executive Director

cc: Susan Eid, Esq

/dh